

# **Exhibit 3**



IN THE DISTRICT COURT OF  
OKLAHOMA COUNTY, STATE OF OKLAHOMA

FILED IN DISTRICT COURT  
OKLAHOMA COUNTY

JUL 17 2023

JOHN DOE, Individually, and on behalf  
of all others similarly situated,

Plaintiff

v.

INTEGRIS HEALTH, INC.,

Defendant.

RICK WARREN  
COURT CLERK

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Case No.: CJ-23-3801

Attorney Lien Claimed

**PLAINTIFF'S MOTION FOR PERMISSION TO PROCEED UNDER A PSEUDONYM**

1. This case arises from the non-consensual intrusion and disclosure into Plaintiff's personal and private matters – namely his protected health information.

2. Plaintiff requests permission to proceed under pseudonyms to protect his identity and his medical information from further public disclosure.

3. Plaintiff also moves the court to order Defendant to maintain the confidentiality of his identity by using only pseudonyms in all of their filings, including all exhibits in which his name appears.

4. Plaintiff John Doe is an adult male citizen of Oklahoma.

5. The Petition was filed on July 10, 2023.

6. Plaintiff will disclose his identity to the Court and Defendant at the direction of the Court.

7. Due to the nature of the claims of this case and the damages alleged, this case necessarily involves examination and consideration of Plaintiff's physical health status and

diagnoses and – importantly – his efforts to seek health treatments through Defendant’s electronic systems.

8. Plaintiff used pseudonyms to protect his identity from being released due to the highly personal and potentially stigmatizing medical information at issue, and the desire to prevent his private personal medical information from being spread further.

9. There are several factors which weigh in favor of allowing Plaintiff to proceed pseudonymously and entering an order that all parties use Plaintiff’s pseudonyms in all documents.

10. The first is the potential for embarrassment and social stigmatization given the nature of the Petition regarding the physical health, treatment, prior diagnoses, and care sought by Plaintiff.

11. Moreover, Plaintiff’s claims sound in intrusion upon seclusion into Plaintiff’s private and personal affairs. By allowing Plaintiff to proceed pseudonymously, Plaintiff seeks to limit his damages further, by limiting, to the extent possible, the necessity of his name on public dockets and filings with his medical records.

12. Additionally, there is a lack of any prejudice to Defendant, actual or otherwise. Courts routinely enter stipulated orders protecting the personal medical information of parties which include forbidding the disclosure of identifiable personal information or personal identifiable information.

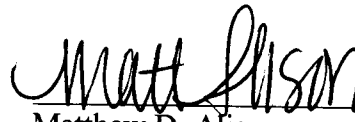
13. Plaintiff does not seek to seal the case, nor does he desire the facts to be shielded from the public eye — Plaintiff merely seeks to prevent the disclosure of his actual name as part of a public record.

14. There is no public interest in the disclosure of Plaintiff’s identity.

15. For the reasons stated above, Plaintiff seeks an order requesting permission to proceed under pseudonyms to protect his identity from public disclosure. As stated, Plaintiff will disclose his identity to the Court and the Defendant.

16. Plaintiff also moves the court to order Defendant to maintain the confidentiality of his identity by using only pseudonyms in all of their filings, including all exhibits in which his name appears.

Respectfully submitted,



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**CERTIFICATE OF SERVICE**

I hereby certify that on the 13 day of July, 2023, a true and correct copy of the foregoing instrument was deposited in the United States mail, to the following persons, postage prepaid, first class:

Integris Health, Inc.  
c/o Brent Hubbard  
3001 Quail Springs Parkway  
Oklahoma City, Oklahoma 73134

  
Matthew Alison